

## REMARKS/ARGUMENTS

Reconsideration and allowance are also respectfully requested. No new matter is added by the amendments herein.

### **Amendment to Specification - Removal of Priority Claim**

The present specification is amended to remove all claims to priority. This is consistent with the Examiner's indication in the Office Action mailed June 28, 2006, that priority is not granted. Accordingly, the present application no longer claims priority to any U.S. patent application.

### **Claim Rejections**

Claims 1 and 21 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,493,677 to Balogh ("Balogh") in view of U.S. Patent No. 6,651,677 to Dudkiewicz ("Dudkiewicz"). Claims 2, 3, 5-11, 22, 23, and 26-33 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Balogh in view of Dudkiewicz, and further in view of U.S. Publication No. 2002/0038308 to Cappi ("Cappi"). Claims 4, 24, and 25 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Balogh in view of Dudkiewicz, further in view of Cappi, and still further in view of U.S. Patent No. 6,182,028 to Karaali ("Karaali").

Applicant respectfully traverses these rejections in view of the amendments and remarks herein.

### **Independent Claim 1, and New Dependent Claim 34**

Independent claim 1 as amended recites:

a suggestion database processor ... configured to search the suggestion database, based on one or more search request criteria, to produce a list of keywords, and to modify the one or more search request criteria with the produced list of keywords.

As acknowledged by the Office, Balogh fails to teach or suggest the recited suggestion database processor. Moreover, Dudkiewicz also fails to teach or suggest the recited database processor as amended. For example, Dudkiewicz fails to teach or suggest modifying "the one or more search request criteria with the produced list of keywords," as now recited in claim 1.

Even more so, Dudkiewicz fails to teach or suggest “a search request processor configured to search the metadata based on the modified one or more search request criteria,” as recited in new dependent claim 34 (which depends from claim 1).

For at least these reasons, it is submitted that neither Balogh nor Dudkiewicz, either alone or in combination, teaches or suggests all of the features recited in amended claim 1 and new dependent claim 34.

**Independent Claim 21 and New Dependent Claim 35**

Independent claim 21 as amended and new dependent claim 35, are also allowable for at least similar reasons as discussed above with regard to amended claim 1 and new dependent claim 34, respectively.

**New Independent Claim 36**

New independent claim 36 is also allowable for at least similar reasons as discussed above with regard to both amended claim 1 and new dependent claim 34.

**Remaining Dependent Claims**

The remaining dependent claims are also allowable by virtue of depending from allowable independent claims, and further in view of the additional features recited therein. Moreover, the addition of Cappi and Karaali fails to overcome the above-discussed deficiencies with Balogh and Dudkiewicz.

**Conclusion**

All rejections having been addressed, Applicant respectfully submits that the present application is in condition for allowance. Should the Examiner have any questions, the Examiner is invited to telephone the undersigned at the number below.

Respectfully submitted,

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